

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	
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- against -	:	1:11-cr-01068-PKC
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LEIB GLANZ,	:	
	:	
Defendant.	:	
	:	
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SENTENCING MEMORANDUM ON BEHALF OF
LEIB GLANZ

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**SENTENCING MEMORANDUM ON BEHALF OF
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I. PRELIMINARY STATEMENT

This memorandum is respectfully submitted on behalf of Rabbi Leib Glanz, who is scheduled to be sentenced by the Court on January 25, 2013. On September 4, 2012, Rabbi Glanz pled guilty before Your Honor to a single-count misdemeanor information charging him with making false statements to the Department of Housing and Urban Development.

Leib Glanz has fully acknowledged his guilt for this offense, and does not seek to avoid responsibility for his conduct or minimize his wrongdoing. Rather, we submit this memorandum to provide context for the Court's consideration of an appropriate sentence. For the reasons set forth below, we submit that a non-custodial sentence is manifestly appropriate in this case in light of the 0-6 month guideline range, Rabbi Glanz's extraordinary record of charitable service and good works, his family commitments, his complete acceptance of responsibility, and the fact that he poses no threat of recidivism or danger to the public.

II. FACTS

A. Personal History

A lifelong resident of Williamsburg, Brooklyn and a member of the Satmar Jewish community, Rabbi Glanz was born in 1958 to Imre and Zlata Glanz. Imre worked in the bookbinding business; Zlata was a homemaker. Imre, age 90, still lives in Brooklyn today. Zlata passed away in 1990 after a [REDACTED]. Rabbi Glanz has nine siblings, all of whom live in Brooklyn or Monroe, New York.

From kindergarten through rabbinical school, Rabbi Glanz attended the United Talmudical Academy (UTA), graduating with a degree in rabbinical studies in 1979, the same year he was ordained as a rabbi. While in school he worked as a teacher and at a grocery store, and then began working at UTA in 1979 in the purchasing department. For the next 11 years Rabbi Glanz worked his way up at UTA, becoming the Executive Director of the school in 1990. UTA was then and is now one of the largest private educational institutions in New York, educating students from kindergarten through college. Under the Rabbi's leadership, it grew to a student population of 18,000. Rabbi Glanz left UTA in 2000 after a change in administration there, and began working as a chaplain for the City of New York Department of Correction, where he worked until 2009. In 2006 Rabbi Glanz also began working for Central United Talmudical Academy (Central UTA), another large private educational institution in the Jewish community, where he still works today as an advisor.

Rabbi Glanz married his wife, Margit (Malka) Fleischman, in 1977. The couple had four children. Jacob, 34, works for B&H Photo; he lives in Brooklyn and is married with six children. Joel, 31, works in construction; he lives in Brooklyn and is married with three children. Esther, 30, is a homemaker in Brooklyn and is married with seven children. The Rabbi's other

daughter, Sarah, passed away in early 2011 at the age of 31 after a [REDACTED]

[REDACTED], leaving behind three children and a husband.

After the birth of their last child, Esther, in 1982, Margit Glanz [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Rabbi Glanz is her primary caretaker and does most of the shopping, cooking and housework, stopping home several times a day to check on her care. (Letters of Rochel Glanz, Esther Neuman (Exhibits 32, 59); *see also* letter of Moshe Goldberger (Exhibit 33))¹ “The mainstay of her support system is my father. It is incredible how he has looked after her and waited on her all these years.” (Letter of Esther Neuman (Exhibit 59)) Prior to her death, Sarah provided significant emotional support to her mother, speaking to her by phone several times a day. Her passing has been particularly hard for Mrs. Glanz, and much of the emotional burden has fallen on Rabbi Glanz. (Letters of Mendel Teller, Esther Neuman, Joel Neuman, Moshe Goldberger (Exhibits 72, 59, 61, 34))

Despite the demands of his paid and volunteer work, Rabbi Glanz has always had an extremely close relationship with his children. He tutored them in their studies and played board games with them every Saturday night. When they went away to summer camp, Rabbi Glanz would visit every week and bring care packages, with extra packages to give to children who did not have any. (Letters of Esther Neuman, Jacob Glanz, Joel Glanz (Exhibits 59, 30, 31);

¹ Letters to the Court on Rabbi Glanz’s behalf are submitted as attachments to this Memorandum. Because of the highly personal and sensitive nature of some of the information contained in this Memorandum as well as the letters, we respectfully request that portions of these materials be filed in redacted form, as reflected in the accompanying cover letter.

see also Letter of Gitty Lowy (Exhibit 54)) His children write about the lessons he taught them about generosity and kindness. For example, when Esther was a child, Rabbi Glanz asked her and other neighborhood girls to always walk by a widow's house on their way to school so that they could wave to her and brighten her day.

The effect of that episode on me has been profound. Ever since then, whenever I pass an elderly person or someone in a wheelchair, I will stop and ask how they are. That seed that my father sowed so long ago did not only affect me but I passed it on to my other children, and the same happened with my friends.

(Letter of Esther Neuman (Exhibit 59)) Joel Glanz describes how his father would always send them to school with extra snacks for children who did not have food to bring from home. "None of us children ever forgot those lessons from our dad and we try to help others as much as we can." (Letter of Joel Glanz (Exhibit 31)).

Rabbi Glanz is also close to his grandchildren. "Dad's relationship with my children is phenomenal. He spends hours with them every week and plays incredible roles in their lives." (Letter of Esther Neuman (Exhibit 59)) "My father is very close to all my children and they are with him every Saturday night." (Letter of Jacob Glanz (Exhibit 30)) Rabbi Glanz is particularly close to the three children of his deceased daughter, Sarah. After her death, her husband, Mendel Teller, was unable to cope and the children were sent to live with other families.

My *shver* [father-in-law] speaks to the girls every day and since Chana Sarah died they spend the Sabbaths and festivals at my *shver*, and most often I with them. They confide their hopes and fears to him and he takes them out to eat at least once a week. I am not ashamed to admit that he is their anchor, because he is mine too.

(Letter of Mendel Teller (Exhibit 72))

Rabbi Glanz is not just a source of stability for his wife and children; he is also the “anchor” for his father, siblings and extended family; “we don’t move without him.” (Letter of Hinda Friedman (Exhibit 23); *see also* Letters of Israel Friedman, Rose Scher (Exhibits 24, 64)) When his mother was [REDACTED]

[REDACTED] (Letter of Imre Glanz (Exhibit 29)) His sister Miriam credits the Rabbi’s care with extending their mother’s life and allowing her to see three of her children married -- weddings which were paid for by funds Rabbi Glanz raised from the community. (Letters of Miriam Friedman, Imre Glanz (Exhibits 25, 29)) [REDACTED]

[REDACTED] (Letter of Miriam Friedman (Exhibit 25)) After her death, Imre Glanz describes the family as “broken people” kept going by Rabbi Glanz. Still today, Rabbi Glanz helps care for his 90-year-old father, [REDACTED] (Letter of Imre Glanz (Exhibit 29); *see also* Letters of Shea Glanz, Rivka Fuchs (Exhibits 33, 28))

In times of crisis, Rabbi Glanz’s siblings also turn to him. When his sister Rose Scher [REDACTED] Rabbi Glanz came to her aid. He helped her leave her husband in Uruguay; raised money to pay for her legal fees; and reunited her with her children. Equally important, he gave her emotional strength and comfort during a harrowing and traumatic experience; “he gave me his heart and support to survive.” (Letter of Rose Scher (Exhibit 64)) His brother Shea Glanz also suffered from [REDACTED]. Throughout those trying times, “Leib was there for me, trying in every way to give me the strength to go forward.” (Letter of Shea Glanz (Exhibit 33)) When his sister Hinda Friedman [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] (Letter of Hinda Friedman (Exhibit 23))

Rabbi Glanz's nieces and nephews likewise look to him in times of need. When his nephew's wife [REDACTED]

[REDACTED] In stepped Rabbi Glanz, who came to see the family to counsel and encourage them. "He picked us up from the lowest depths and showered us with warmth and guidance." (Letter of Israel Friedman (Exhibit 24)) When the infant child of his nephew Mordechai [REDACTED] Rabbi Glanz was there for him. [REDACTED]
[REDACTED]

[REDACTED] (Letter of Mordechai Friedman (Exhibit 26)) When his niece Zlata's baby

[REDACTED] (Letter of Zlata Wieder (Exhibit 78))

As his niece Gitty Lowy writes, "The truth be told, he was like a father to me and he is like a father to hundreds of members in our community." (Letter of Gitty Lowy (Exhibit 54))

Whether it is emotional comfort, financial assistance or medical advice, Rabbi Glanz is the family member to whom everyone looks for guidance.

B. Community Service

The counseling, advice and financial assistance that the Rabbi provides for his family is merely the tip of the iceberg of his generosity, which extends throughout and beyond the Satmar Jewish community. Rabbi Glanz is the "go to guy" in the community when people need help -- with financial issues, with health problems, and with emotional crises. (Letters of Yidel Deutsch, Erwin and Eva Eidlisz (Exhibits 8, 9)) As Ernest Feldman describes it, "In our

community, there are different organizations and individuals who are always available to help in emergencies. One of them, and to whom we are greatly indebted, is Rabbi Leib Glanz.” (Letter of Ernest Feldman (Exhibit 17))

The letter of Grand Rebbe Aron Teitelbaum, leader of the Satmar community, explains how central Rabbi Glanz is to the philanthropic heart of the community. Those in the community who are struggling financially or have special needs invariably turn to the Rabbi, who reaches out to wealthier members of the community to raise funds for whatever is needed -- payment for medical procedures, funds for a wedding, college tuition for a child, and so on. Rabbi Teitelbaum estimates that Rabbi Glanz has raised millions of dollars for those in need. Equally important, the Rabbi is unfailingly generous with his home, his time, and his heart to those needing a bed, guidance, or kindness. As Rabbi Teitelbaum explains, “Rabbi Glanz is truly a singular individual whose outreach and compassion are legendary both within and without the community.” (Letter of Aron Teitelbaum (Exhibit 70))

The sheer number of hours devoted by Rabbi Glanz, and the number of people whom he has helped, is unparalleled. “Without any exaggeration, when it comes to helping out someone he is a man to whom day and night doesn’t make a difference” (Letter of Devorah Brief (Exhibit 6)) Equally remarkable is his approach to these good works, one that is universally described as humble. “Whether providing free volunteer ambulance service, food and clothing for the poor, visits to and transportation for families of those hospitalized, I came to learn that Rabbi Glanz devoted himself to doing good work with no reward except for the knowledge that he was helping others.” (Letter of Benjamin Brafman (Exhibit 2)) “In all his achievements he never looked for any honors.” (Letter of Chaya Franczoz (Exhibit 22)) “He does not seek honor or recognition, nor does he need thanks or accolades. He is always just there

making a difficult situation manageable.” (Letter of Shea Hecht (Exhibit 44); *see also* Letter of Fruma Schwartz (Exhibit 665)) As a Hatzolah colleague states, “It is simply in his DNA to devote his time, talent, contacts, efforts, skills, and his friendly smile to anyone who would need them.” (Letter of Menachem Weinberger (Exhibit 75)) While Rabbi Glanz may not boast about his charitable works, the dozens of letters submitted on his behalf do.

1. *Charitable and Educational Institutions*

Rabbi Glanz has been an active volunteer with charitable institutions for more than 35 years. In 1977 he joined Hatzolah, the Jewish volunteer ambulance corps, where he was “one of the most remarkable volunteers that we had,” “always available to go out on calls with his ready smile and caring heart.” (Letters of Hatzolah, Chaya Franczoz (Exhibits 43, 22)) His volunteer and coordinating work at Hatzolah was “24/7” (Letter of Shea Hecht (Exhibit 44)) and he has been out on “dozens of calls every year.” (Letter of Hatzolah (Exhibit 43); *see also* Letters of Joseph Waldman, Menachem Weinberger (Exhibits 73, 75)) His training as an EMT has allowed him to literally save lives. (Letter of David Weiss (Exhibit 76)) Not only does he volunteer for Hatzolah; he is also actively involved with raising money to support the organization. (Letter of Joseph Waldman (Exhibit 73)) Rabbi Glanz has also been actively involved with the Satmar Ladies Bikur Cholim, an organization that brings meals to homebound, ill and hospitalized members of the Jewish community. “With his vast experience in coordinating events, he was always available to supply our organization with assistance that enabled us to generate the needed funds.” In addition to raising money, Rabbi Glanz personally delivered food packages to hospital patients. (Letter of Hillel Spitzer (Exhibit 69)) Rabbi Glanz also has served as the Executive Vice President of UJ Care, a charity in Williamsburg. In 2008, recognizing that the financial crisis would limit some families’ ability to celebrate the Passover holiday, he organized a food drive in which 57 volunteers handed out food packages to more

than 2,000 Williamsburg families in need. (Letters of Rivkah Ellinson, Joseph Waldman (Exhibits 11, 73))

Many of the charitable and educational institutions with which the Rabbi has worked credit him with their success. When Zvi Kohn founded the Rofeh Cholin Cancer Society, an organization providing services for cancer patients, he turned to Rabbi Glanz for help with organizing and fundraising.

Rabbi Glanz was unstinting with his time and effort. He attended the planning conference, advised on outreach to the community and to philanthropists. He attended and spoke at many parlor meetings. As a noted, respected active leader in the community, Rabbi Glanz has offered his tireless and unrelenting assistance in many venues that helped raise the vital funds to save lives of cancer patients.

(Letter of Zvi Kohn (Exhibit 49); *see also* Letter of Raizel Weiss (Exhibit 77)) The National Children's Leukemia Foundation similarly benefitted from the Rabbi's efforts. The organization began as a bone marrow drive spearheaded by Rabbi Glanz to help [REDACTED]

[REDACTED] Rabbi Glanz not only generated a list of 10,000 potential donors, he also located financial sponsors to pay for the testing of those donors. [REDACTED]

[REDACTED] they were the genesis of the formation of the National Children's Leukemia Foundation. (Letter of Zvi Shor (Exhibit 67))

Rabbi Glanz has also given countless hours to educational institutions and the children they serve. In his role as Executive Director of UTA, Rabbi Glanz went above and beyond to help children [REDACTED], working "virtually round the clock" to establish the first [REDACTED] at UTA (or any Hasidic school) and allowing the children in the program to receive their education free of charge. (Letters of Elya and Leah Posen, Saul Klein (Exhibits 63, 48)) The parents of the children in that program credit Rabbi Glanz with allowing their children to succeed [REDACTED]. (Letter of Elya and

Leah Posen (Exhibit 63)) When Central UTA was founded in 2006, the Rabbi worked free of charge to get the new school system up and running in just the course of a few months -- finding school buildings, creating an administrative structure, organizing transportation, and so on. “The entire Board of Central UTA agrees that without Rabbi Glanz we would not have gotten the entire program on its feet.” (Letter of Moshe Indig (Exhibit 46)) Rabbi Glanz also was instrumental in opening a summer camp for the girls of the Satmar community. Working day and night, he supervised the building of the camp over a period of just two months so that it would be ready in time for the 2,000 girls who had registered to attend. Even today, when issues arise at the camp, “he is always just a phone call away.” (Letter of Joel Mittelman (Exhibit 56))

The Rabbi’s efforts extended to the needs of individual students. For example, when he learned of a boy who [REDACTED], he organized a fundraiser for the boy’s family, which was very poor, [REDACTED] [REDACTED] (Letter of Aharon Moskowitz (Exhibit 58)) When Wolf Landau, a student at the school, lost his mother, Rabbi Glanz learned of his grief and “always found time to listen to me, even if it was the childish things or cares of a small boy . . .” (Letter of Wolf Landau (Exhibit 52); *see also* Letter of Shifra Ekstein (Exhibit 10))

2. *Aid in Crises*

In times of crisis, Rabbi Glanz is the person in the Satmar community to whom people turn. Whether organizing massive volunteer efforts or simply listening to those in anguish, the Rabbi has made a difference in people’s lives at the times they needed it most.

In 1994, a 14-year-old girl from the Satmar community, Suri Feldman, went missing during an outing to a Connecticut state park. Rabbi Glanz coordinated a search team of hundreds of people who combed through the park, searching for the missing girl, even arranging

for a helicopter to fly food in for the volunteers. Happily, Suri was found alive and safe after two days. Even today, 18 years later, her parents will never forget the “extraordinary efforts” of Rabbi Glanz. (Letter of Ernest and Rose Feldman (Exhibit 17); *see also* Letter of Menachem Weinberger (Exhibit 75))

Suri Feldman is not the only missing child for whom the Rabbi has gone to such lengths. In 1998, a six-year-old boy with [REDACTED] Chaim Weill, was kidnapped by his babysitter. Again, Rabbi Glanz organized a search group of hundreds of people, providing them with pictures and other information about the boy. During this terrifying time, it was Rabbi Glanz who gave Chaim’s parents comfort. Eventually Chaim was found in Virginia and returned to his family. (Letter of Jacob and Leah Weill (Exhibit 74); *see also* Letter of Menachem Weinberger (Exhibit 75))

The most massive crisis in which the Rabbi provided crucial assistance was on September 11. As soon as he heard about the attacks, Rabbi Glanz took one of the Hatzolah ambulances, removed the stretchers, and packed it with food and water. Driving to the World Trade Center site, he set up a serving station, which was the central place for responders to eat during the first 24 hours. “Lines of workers, caked in white powder and ash came to get sandwiches, food and something to drink. In the meantime, Leib had other Hatzolah ambulances shuttling back and forth bringing more food supplies for the responders.” Not only did Rabbi Glanz feed these responders, he provided comfort to families searching for news of their loved ones. “He spoke with them and counseled them. He hugged them and encouraged them, and put through calls to whichever entity he could to try and help them.” (Letter of Yidel Deutsch (Exhibit 8); *see also* Letters of Menachem Weinberger, Joseph Waldman (Exhibits 75, 73))

When families have experienced [REDACTED], Rabbi Glanz has been their mainstay. Joseph and Eva Gottlieb [REDACTED] [REDACTED] “Rabbi Leib Glanz was the right-hand of our family through all that took place.” He stayed with the family [REDACTED] [REDACTED]. During the seven days of mourning that followed, Rabbi Glanz took care of the family’s restaurant, ensuring that food was distributed to the schools and the needy so that it would not go to waste. “As traumatic and difficult as that time was for us, whatever was humanly possible to bring comfort and ease our pain, was done by Rabbi Glanz.” (Letter of Joseph and Eva Gottlieb (Exhibit 35)) Rabbi Glanz provided similar assistance to Chanie Neustadt after her family was in a terrible car accident two years ago -- [REDACTED] and giving her comfort when she was full of fear. Chanie calls him “the inspiration and strength of our family” during this terrible time. (Letter of Chanie Neustadt (Exhibit 62))

3. *Helping the Sick, Injured and Infirm*

Numerous letters recount how Rabbi Glanz has helped people during times of sickness, in recovering from injuries, and providing care to the elderly. Such work has been part of the Rabbi’s life since he was a rabbinical student, when he cared for Rabbi Joel Mertz, the elderly father of Rabbi Yechezkel Mertz of Congregation Tolaas Yaakov, Rabbi Glanz’s place of worship. “Every night after yeshiva, Leib would go to the home of Rabbi Joel to make him comfortable and to look after him.” Rabbi Glanz cared for Rabbi Joel for three and a half years, even going so far as to convert Rabbi Joel’s dining room into a small synagogue so that he could worship at home. (Letter of David Mertz (Exhibit 55)) Rabbi Glanz also has cared for the children of Rabbi Chaim Mertz, Rabbi Joel’s grandson, [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] There is no doubt that this could not have been achieved without the constant support and effort of Leib Glanz.” (Letter of David Mertz (Exhibit 55))

Rabbi Glanz also cared for multiple members of his sister Blima Halpert’s family.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

(Letter of Blima Halpert (Exhibit 42)) Other family members have likewise benefitted from the Rabbi’s intervention. (Letters of Gittel Honig, Sarah Klein (Exhibits 45, 47)) His hospitality is not limited to those he knows; strangers in need of a place to rest have found a place at Rabbi Glanz’s home. (Letter of Leah Mizrahi (Exhibit 57))

Several people credit Rabbi Glanz for helping them recover from serious accidents. Last year, Moshe Friedman was hit by a bicycle [REDACTED]. Rabbi Glanz was at the accident scene [REDACTED]

[REDACTED] (Letter of Moshe Freidman (Exhibit 27)) Rabbi Glanz similarly cared for Baila Berkowitz after she was in a severe car accident [REDACTED]

[REDACTED] (Letter of Baila Berkowitz (Exhibit 1)) When Hadassah Neuman's father was struck by a car [REDACTED]

[REDACTED]

[REDACTED] (Letter of Hadassah Neuman (Exhibit 60))

Some of the most heartbreaking and touching letters about Rabbi Glanz's compassion and care are from women [REDACTED]

[REDACTED] When Faigy Feder was five months pregnant with her second child, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] In stepped Rabbi Glanz, who "was like an angel to us" and took care of everything. "I am overwhelmed by what Rabbi Glanz did for us, and enabled us to get our lives together and move forward." (Letter of Faigy Feder (Exhibit 15)) Rabbi Glanz did the same for his sister, Blima, [REDACTED]

[REDACTED] "It was so very painful, but Leib helped us through that crisis as well He brought calm when we so needed it." (Letter of Blima Halpert (Exhibit 42); *see also* Letter of Bat Sheva Gross (Exhibit 37))

Rabbi Glanz's care for those who are ill extends all the way to those in Israel who need to travel to the United States [REDACTED]. Miriam Guttman's husband Avraham was [REDACTED] at the time the Persian Gulf War started. While struggling to cope with

[REDACTED] and her four children during a war, she received a call from Rabbi Glanz, a distant relative, who invited the family to come to the United States [REDACTED]

[REDACTED] Not only did Rabbi Glanz arrange for the family's housing [REDACTED]
[REDACTED], and sent or brought Miriam and Avraham kosher food every day. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] After Avraham's passing, Rabbi Glanz flew home with the family to Israel to make sure all the arrangements were in order. "There is no way I can begin to thank him -- just to say that for us he was and is a messenger from up on High, to extend a lifeline to the sick, the poor and the lonely." (Letter of Miriam Guttman (Exhibit 40); *see also* Letter of Blimy Glauber, Suri Meisels, Hinda Klein, and Mendel Guttman (Exhibit 41)).

4. *Opening His Home to Others*

Among the myriad ways in which Rabbi Glanz helps others is by opening his home to them. For those in need, the Rabbi's home becomes their home for weeks, months or even years, as in the case of Meir Braun. Meir's mother left when he was eight; by the time his father remarried several years later, Meir was known for his misbehavior, making his stepmother reluctant to take him in. Rabbi Glanz stepped in and took Meir into his home. Meir was given his own corner in the Rabbi's apartment at the time; when the Rabbi moved to a bigger apartment, he was given his own room. Rabbi Glanz arranged for him to attend a yeshiva upstate and raised money in the community for his tuition and his other needs. Meir's father writes that the Rabbi "did everything for Meir that I should have done as a father, but that I could

not do.” Meir lived with Rabbi Glanz’s family for six years; even today, his room in the Rabbi’s apartment is known as “Meir’s room.” (Letters of Avraham Braun and Meir Braun (Exhibits 3, 4))

Many people have recuperated from serious surgeries or illnesses at Rabbi Glanz’s home. Six years ago, Eva Eidlisz [REDACTED]; her home, where her 11 children lived, was not a viable option. Rabbi Glanz invited her to stay with him as long as she wished. She writes of Rabbi Glanz’s hospitality:

They gave me a comfortable room and a bedside phone. He would always ask if I needed anything and if in a conversation I would say it would be nice to have this or that, Rabbi Glanz would go out to get it. [REDACTED]

[REDACTED] and Rabbi Glanz would speak with me and recite psalms and prayers for my recovery, something that gave me much comfort and encouragement. The most tender hospitality was so generously accorded to me, and I believe it enabled me to come back to my eleven children fully recuperated.

Eva stayed with Rabbi Glanz for six weeks. A few years later, Rabbi Glanz repeated the hospitality for her husband [REDACTED]. (Letter of Eva Eidlisz (Exhibit 9))

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] At 3 a.m. she and her husband knocked on Rabbi Glanz’s door, looking for a place to stay, and were welcomed with open arms. [REDACTED]

[REDACTED] “I look at my miracle 9-year-old son and remember a time of trauma for us and our feelings of undying gratitude to Rabbi Leib Glanz.” (Letter of Fradel Spitzer (Exhibit 68)) [REDACTED]
[REDACTED]

[REDACTED] (Letters of Hinda Friedman and Rochel Glanz
(Exhibits 23, 32)) [REDACTED], Rabbi Glanz welcomed her other
children into his home so that she could recover in peace and quiet. (Letter of Sima Braun
(Exhibit 5))

Several women have also found solace in the Rabbi's home while [REDACTED]. When his sister Zisy [REDACTED], she and her daughter stayed with Rabbi Glanz until they moved to an apartment of their own. "Leib and his wife, Malka, calmed me down and took me into their home and gave me such a warm and comfortable home with them and their children." (Letter of Zisy Englander (Exhibit 12)) His daughter's friend Klara Greenfeld found a home with Rabbi Glanz when she was [REDACTED]. "We spent much time there, so much so that my children called him Zaidy (grandpa) Glanz, and they still do so today." Klara credits Rabbi Glanz for bringing normalcy and structure to her children's lives during that trying time. (Letter of Klara Greenfeld (Exhibit 36))

Entire families have found a home with Rabbi Glanz during times of need. After Shanie Schonbrun's home was flooded in 1999 during Hurricane Floyd, she called Rabbi Glanz, who welcomed her, her husband and three children in the middle of the Jewish high holidays. "We stayed there for over a month. During that time they never asked how long would we be staying. The only question was, what else can we do for you?" (Letter of Shanie Schonbrun (Exhibit 65); *see also* Letter of Rachel Landau (Exhibit 51)) Rabbi Glanz also provides hospitality simply to families needing a place to stay during wedding celebrations or when displaced by problems with their apartments. (Letters of Moshe Goldberger, Gitty Lowy (Exhibits 34, 54))

The hospitality of Rabbi Glanz also has brought deep comfort and care to those at the end of their lives. Chana Gross writes of her daughter Zissy, a mother of four [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Chana

describes the scene at Rabbi Glanz's house:

It had been so very hard for people to come and see her [REDACTED], but the environment at Rabbi Glanz's home made all the difference. [REDACTED]

[REDACTED] However, they loved visiting time at the Glanz home where Rabbi Glanz would prepare little gifts and goodies for them.

Rabbi Glanz's hospitality meant the world to Zissy and her family, and made the end of her life as comfortable as possible. "My husband and I are sure that if Zissy, may she rest in peace, was alive she would definitely send you this letter." (Letter of Chana Gross (Exhibit 38))

5. *Raising Donations for Those in Need*

As described above, it is routine in the Satmar community for wealthier members to donate funds to assist those in financial need. Rabbi Glanz is one of the most prolific fundraisers in the community. As Grand Rabbi Aron Teitelbaum explains:

[M]any of the poor or those who have special needs turn to Rabbi Glanz for help knowing that the wealthier members of the community and its philanthropists respect and respond to each cause that Rabbi Glanz brings to their attention. These causes range from sponsoring weekly food packages to poor families, clothing and yeshiva tuition for their children, special needs children and the sick, wedding expenses and setting up homes for couples that are poor, through to funds to build schools and synagogues. For all these causes Rabbi Glanz has raised hundreds

of thousands - no, millions - of dollars. The money is forthcoming simply on his trusted word.

(Letter of Aron Teitelbaum (Exhibit 70)) Countless members of the community recount stories of how Rabbi Glanz raised funds to help pay for college tuition (Letters of Avraham Braun, Zisy Englander (Exhibits 3, 12)), [REDACTED] (Letters of Faigy Feder, Moshe Friedman (Exhibits 15, 27)), [REDACTED] (Letter of Teresa Yabra (Exhibit 79)), weddings (Letter of Devorah Brief (Exhibit 6)), funerals (Letters of Faigy Feder, Blima Halpert (Exhibits 15, 42)), and simple daily needs (Letters of Aharon Moskowitz, Sima Braun (Exhibits 58, 5)).

Rabbi Glanz does not just raise money to help others; he also helps them to find jobs in order to support themselves. Baila Farkas was a divorced mother of two and nearly destitute when she went to Rabbi Glanz for help. After listening sympathetically to her story, he asked her about her skills, education and experience and then offered her a job teaching at UTA. Thanks to Rabbi Glanz, Baila was able to rebuild her finances and provide for her children. (Letter of Baila Farkas (Exhibit 13)) Abraham Fish was in a similarly financially precarious situation when he sought help from Rabbi Glanz. Laid off for several months, he had no money to support his wife and six children. After meeting with the Rabbi, Abraham got an interview for a job as a bus driver and was hired. "He got me what I needed -- not a handout but helped me get a job." (Letter of Abraham Fish (Exhibit 18)) Rabbi Glanz did the same for Moshe Kraus in 2011 when he was laid off and without means to support his family of five, opening the door to a job at a mortgage brokerage firm. (Letter of Moshe Kraus (Exhibit 50))

Rabbi Glanz's fundraising efforts and abilities have helped many families avoid financial catastrophe. Leah Farkas tells the story of her family's business -- a retailer and wholesaler of Judaica items -- which was destroyed by a fire two years ago shortly before Passover, the store's biggest season for sales. Desperate to try to reopen, her family turned to

Rabbi Glanz for help. Rabbi Glanz ensured that they received the help and support of the community to make the re-opening a success, even taking out an advertisement in the community paper. (Letter of Leah Farkas (Exhibit 14)) Rabbi Glanz did the same for Moses Fleischman after his grocery store burned down. “[H]e threw himself completely into helping us. He spoke to people in the community who were prepared to put up money to help, and then hired a company to demolish the garbage since the whole grocery was burned.” Moses’s store reopened in just one month. (Letter of Moses Fleischman (Exhibit 21))

6. *Comfort and Counseling*

Perhaps the least visible but vitally important work done by Rabbi Glanz is the counseling he provides to people in need. Letter after letter tells of the comfort, kind words and hope that he has given to people at some of their absolute lowest points. Moses Fleischman’s experience after his grocery store burned down is typical. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] All of this changed when Rabbi Glanz arrived to help and counsel the entire family. “[H]e saved me and my family from being broken completely - emotionally and physically. He gave us the hope and things started getting better and better.” (Letter of Moses Fleischman (Exhibit 21))

The people to whom Rabbi Glanz has given comforting words and lent an open ear run the gamut -- from family, to youth in the community, to long-time friends. When his sister was [REDACTED], he gave her “his heart and support to survive.” (Letter of Rose Scher (Exhibit 64)) When Miriam Fekete [REDACTED] he counseled her and helped her [REDACTED] (Letter of Miriam Fekete (Exhibit 16))

When Wolf Landau was a 14-year-old boy grieving the death of his mother, Rabbi Glanz “always found time to listen to me.” (Letter of Wolf Landau (Exhibit 52)) When Moshe and Yidis Teitelbaum’s daughter was struck by a car in a life-altering accident, Rabbi Glanz was there “[d]uring the entire story He spoke with us and comforted us and helped us through until we found some way to cope with the reality.” (Letter of Moshe and Yidis Teitelbaum (Exhibit 71)) When Moshe Indig’s wife was [REDACTED], Rabbi Glanz regularly visited her and Moshe [REDACTED]. “Often, he would ‘drag’ me out to spend half an hour in Central Park where he spoke to me and gave me encouragement to face the challenge before us. He also spent time with my wife and [REDACTED]. I will be forever indebted to him for his wonderful kindness.” (Letter of Moshe Indig (Exhibit 46); *see also* Letter of Getzel Fish (Exhibit 20) (“He saved me -- as simple as that!”); Letter of Blima Fish (Exhibit 19))

Even religious observances and holidays cannot stop Rabbi Glanz from providing solace and support. Only a few days before Rosh Hashanah, Tzivia Leifer’s son [REDACTED] [REDACTED]. Not only did Rabbi Glanz arrange for her other children to be cared for, he also stayed with Tzivia and her husband [REDACTED] to give them advice and support. Religious proscriptions forbid traveling by car during the high holidays, so Rabbi Glanz walked from Williamsburg to Manhattan on those days to see and encourage the family. “Honestly, I don’t know how we could have survived this tragedy without him.” (Letter of Tzivia Leifer (Exhibit 53); *see also* Letter of Menachem Weinberger (Exhibit 75))

People credit Rabbi Glanz’s counseling and guidance with saving their lives. Through all of Kaya Gross’s troubles -- [REDACTED] -- Rabbi Glanz was there for her. “If he saw me on the street, he would smile at me and speak with

me, and I found myself sitting down to a meal again, an enjoyable laugh and some story to cheer me up. His offer to help was always there.” [REDACTED]

she was terrified of what would happen next and called Rabbi Glanz. Not only did his words calm her in this time of crisis, he helped her find a job that allowed her to rebuild her life. She states that, without Rabbi Glanz, she would be [REDACTED]

[REDACTED] (Letter of Kaya Gross (Exhibit 39)) Solomon Bucaretzky tells a similar story of the guidance provided by Rabbi Glanz [REDACTED]

[REDACTED] there was one person, only one person, who would not let go of me and that was Rabbi Glanz.” (Letter of Solomon Bucaretzky (Exhibit 7))

One of the most heartbreaking, and heartwarming, stories of the Rabbi’s kindness is told by Teresa Yabra. Rabbi Glanz came into her life when her daughter Miriam and son-in-law Yossi had reached a breaking point [REDACTED]

[REDACTED]

[REDACTED]

he personally counseled Miriam and Yossi’s children as well as Teresa. “Rabbi Glanz would also come over to my apartment and he spoke to me for hours. He gave me the emotional and spiritual strength to continue. He slowly brought me back [REDACTED]

[REDACTED] and for the last ten months Rabbi Glanz has been in touch with the family almost daily. “He tried, and is still trying, to do everything possible for me, my daughter, may she rest in peace, and her family. We cannot live without him.” (Letter of Teresa Yabra (Exhibit 79))

C. The Offense

This case has its origins with Rabbi Glanz's younger brother, Menashe, who also lives in Williamsburg. Menashe was, beginning in 1982 and for many years thereafter, the legitimate recipient of Section 8 rent subsidies. Desperate for more space for his rapidly-growing family, Menashe moved to a larger home at 31 Ross Street in Williamsburg. But Menashe stated that he needed to retain his Section 8 rent subsidy to survive, even though his 31 Ross Street residence disqualified him from receiving the funds. Menashe asked that the Rabbi allow Menashe to claim that he lived at the Rabbi's apartment, located at 85 Ross Street, instead of 31 Ross Street. In a misguided and wrongful attempt to help his brother, Rabbi Glanz agreed to this arrangement.

For Menashe to receive Section 8 benefits, the landlord of 85 Ross Street, which was UTA, had to sign a contract with the New York City Housing Authority (NYCHA), which administered the Section 8 program on behalf of the Department of Housing and Urban Development (HUD). Rabbi Glanz signed NYCHA contracts between 1995 and 2000, the year he left UTA, which falsely stated that Menashe was living at 85 Ross Street. Rabbi Glanz received absolutely no benefit whatsoever from this arrangement.

Based on his signing of three NYCHA contracts that contained false statements, Rabbi Glanz pled guilty to the misdemeanor of making false statements to HUD (18 U.S.C. § 1012).

III. SENTENCING

A. Guidelines Calculation

The Sentencing Guidelines applicable to Rabbi Glanz's offense is the November 1, 2000 edition. The specific applicable guideline is § 2B1.1, which has a base offense level of 4. Because the loss in question (\$36,484) exceeded \$20,000 but did not exceed \$40,000, an

increase of 6 levels is warranted. U.S.S.G. § 2B1.1(b)(1)(G). With credit for the Rabbi's acceptance of responsibility, a 2-level reduction is warranted. § 3E.1.1(a). Accordingly, the adjusted guideline offense level is 8. With no criminal record, Rabbi Glanz is in Criminal History Category I. Based on these calculations, the Stipulated Guidelines range is 0-6 months imprisonment, with an applicable fine range of \$1,000 to \$10,000. (Presentence Investigation Report, ¶¶ 68, 75; Plea Agreement, p.2, ¶ C)

Rabbi Glanz already has paid the applicable restitution in this case of \$36,484, which is the amount of Section 8 subsidies paid pursuant to the NYCHA contracts that he signed.

B. A Non-Custodial Sentence is Sufficient, But Not Greater Than Necessary, Under Section 3553(a)

Under the applicable Sentencing Guidelines, Rabbi Glanz qualifies for a non-custodial sentence. Based on an analysis of the sentencing factors in 18 U.S.C. § 3553(a), there are numerous reasons why a non-custodial sentence is indeed the sentence that is warranted in Rabbi Glanz's case.

1. *Nature and Circumstances of the Offense and History and Characteristics of the Defendant*

Rabbi Glanz's exceptional history of charitable acts and good works strongly supports the imposition of a non-custodial sentence. Since he was a rabbinical student in the 1970s, Rabbi Glanz has been continuously performing charitable work, both with organizations such as Hatzolah, Rofeh Cholim Cancer Society, UJ Care and Satmar Ladies Bikur Cholim, as well as countless acts of individual charity. His good works range from the small, such as bringing food packages to the sick and counseling those in need, to the truly massive, such as feeding emergency responders after 9/11, organizing bone marrow drives with thousands of potential donors, and opening his home to those in need for months or even years.

Virtually none of these acts involve donations of the Rabbi's own funds, of which he has little. Instead, they involve raising funds -- millions of dollars over the years -- from wealthier members of the community. Just as importantly, much of the Rabbi's good works involve the commitment of his time, his energy, and his heart. Rabbi Glanz has given his home to a child in need and to those who are ill; he has helped people rebuild their livelihoods after devastating fires; and he has counseled people for hours and days in times of crisis -- during terminal illnesses, after calamitous accidents or when children have gone missing.

Rabbi Glanz's charitable works go far above and beyond those of any average person. Numerous people describe him as the go-to person in the community for those in need. As Rabbi Teitelbaum writes, "Rabbi Glanz is truly a singular individual whose outreach and compassion are legendary both within and without the community." (Letter of Aron Teitelbaum (Exhibit 70)) Despite these extraordinary acts, Rabbi Glanz does not seek recognition or accolades for his charitable work. He does it simply for the sake of helping others.

Other defendants who have engaged in similar charitable works have received non-custodial sentences, despite the fact that they were convicted of more serious crimes and had notably higher guideline ranges. For example, the defendant in *United States v. Greene* pled guilty to 13 felony counts of aiding and assisting in the preparation of false tax returns. 249 F. Supp. 2d 262, 263 (S.D.N.Y. 2003). Despite the fact that defendant faced a guideline range of 18 to 24 months, the court sentenced him to three years' probation based on the fact that he had adopted six underprivileged boys, several of whom had special needs. 249 F. Supp. 2d at 265; *see also United States v. Canova*, 412 F.3d 331, 358-59 (2d Cir. 2005) (defendant convicted of several felony counts arising out of Medicare fraud scheme and facing 15-21 months sentenced to four years' probation based on service in the Marines and as a volunteer firefighter and fact

that he had saved several lives); *United States v. Woods*, 159 F.3d 1132, 1136-37 (defendant convicted of felony charges of bankruptcy fraud and money laundering sentenced to three years' probation based on taking two troubled young women into her home and caring for an elderly friend). Nearly every charitable deed performed by these defendants has been performed by Rabbi Glanz -- and, in many cases, several times over. He has served as a volunteer emergency medical technician and helped save lives; organized significant volunteer efforts; taken people in need into his home; and cared for the elderly.

The nature of Rabbi Glanz's offense also warrants a non-custodial sentence. Rabbi Glanz pled guilty to the misdemeanor of making false statements to HUD. The basis for this offense is his signing three contracts between 1995 and 2000, over 12 years ago, which falsely stated that his brother lived at 85 Ross Street. Rabbi Glanz received no financial benefit from his conduct, and has fully accepted responsibility for his wrongdoing. As reflected by the 0-to-6 month sentencing guideline range for this offense, a non-custodial sentence is entirely appropriate.

2. *The Need for the Sentence Imposed to Reflect the Seriousness of the Offense, to Promote Respect for the Law, to Provide Just Punishment for the Offense, and to Adequately Deter Criminal Conduct*

Rabbi Glanz's plea to a misdemeanor will cause him, for the first time in his life, to have a criminal conviction. Such a stain on his name and reputation is a serious blow for him -- one for which he feels a deep sense of shame and regret. "He so regrets transgressing the law, something which is so contrary to his nature and life. He and I have spoken about his case at length and I can assure the Court that his shame and humiliation have already exacted a significant toll and punishment." (Letter of Aron Teitelbaum (Exhibit 70); *see also* Letter of Shea Hecht (Exhibit 43) ("I strongly feel the punishment that he brought upon himself is in and of itself very severe. He sees and feels the heartache he has brought to his wife, children,

members of his family and the community and it is something he has to live with everyday.”); Letter of Jacob Glanz (“I know, and he has said to me many times, that he so regrets having become involved in what happened and his embarrassment in the community has been great and painful.”) (Exhibit 30))

A non-custodial sentence properly reflects the relative seriousness of this misdemeanor offense. Such a sentence is within the guidelines range for this offense, and will subject Rabbi Glanz to real restrictions on his liberty. *See, e.g., Gall v. United States*, 552 U.S. 38, 48 (2007) (“Offenders on probation are nonetheless subject to several standard conditions that substantially restrict their liberty.”); *United States v. Davis*, 07 CR. 727 (HB), 2008 WL 2329290, at *6 (S.D.N.Y. June 5, 2008).

3. *The Need for the Sentence Imposed to Protect the Public from Further Crimes*

Rabbi Glanz’s age, combined with his lack of criminal record and extraordinary history of charitable works, make the possibility of any potential “further crimes” well nigh unthinkable. A study by the United States Sentencing Commission found that the recidivism rate of offenders drops significantly after age 40. *See* U.S. Sentencing Comm’n, *Measuring Recidivism: The Criminal History Computation of the Federal Sentencing Guidelines* at 28 (May 2004), available at http://www.ussc.gov/Research/Research_Publications/Recidivism/200405_Recidivism_Criminal_History.pdf. Courts have similarly recognized this age-related drop in recidivism. *See United States v. Ruiz*, No. 04 CR 1146-03 (RWS), 2006 WL 1311982, at *4 (S.D.N.Y. May 10, 2006) (imposing non-guideline sentence on 46-year-old defendant because “defendants who, like Ruiz, were over the age of forty at the time of sentencing . . . exhibit markedly lower rates of recidivism in comparison to younger defendants”); *Simon v. United States*, 361 F. Supp. 2d 35, 48 (E.D.N.Y. 2005) (imposing non-guideline sentence on 43-

year-old defendant in part because “recidivism drops substantially with age”). At the age of 54, Rabbi Glanz is statistically unlikely to ever commit another crime.

Equally important is the fact that Rabbi Glanz’s offense, committed more than 12 years ago, was in marked contrast to a life filled with an extraordinary litany of good deeds. Various people have commented on how the Rabbi’s conduct in this case was completely contrary to the exemplary life he has led. (Letter of Aharon Moskowitz (Exhibit 58) (“I am extremely saddened that he finds himself facing sentencing for transgression of the law, because such conduct is diametrically opposed to conduct associated with Rabbi Glanz.”); Letter of Hillel Spitzer (Exhibit 69) (“[P]lease consider that this was an aberration in a life of service to others.”); Letter of Aron Teitelbaum (Exhibit 70)) It is inconceivable that Rabbi Glanz would ever return to the criminal justice system again.

4. *The Kinds of Sentences Available*

The sentencing guidelines applicable to Rabbi Glanz’s sentence already permit the imposition of a non-custodial sentence without any departure or variance; such a sentence is therefore squarely within the kinds of sentences available for this offense. Moreover, as discussed above, a non-custodial sentence would be consistent with the sentences received by defendants convicted of more serious crimes who had histories of good works similar to, or even less extensive than, that of Rabbi Glanz.

5. *The Need to Avoid Unwarranted Sentence Disparities Among Defendants With Similar Records*

There is no other defendant in this case who has pled guilty to a similar crime. Rabbi Glanz’s only co-defendant, his brother Menashe, pled guilty to the felony charge of theft of government funds (18 U.S.C. § 641). In fact, a non-custodial sentence is consistent with the only other reported sentence of an individual who, like Rabbi Glanz, pled guilty to a single

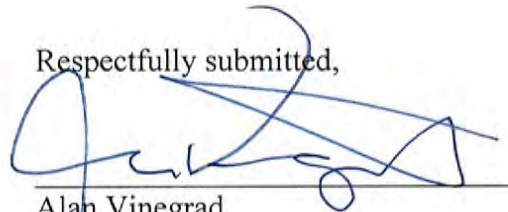
violation of 18 U.S.C. § 1012. *See United States v. Cervantes*, 420 F.3d 792, 794 (8th Cir. 2005) (sentence of five years' probation and \$20,000 in restitution).

IV. CONCLUSION

For all the reasons set forth above, we respectfully submit that a non-custodial sentence will be sufficient, but not more than necessary, to comply with the purposes of sentencing, and thus constitutes an appropriate resolution of this case.

Dated: January 11, 2013
New York, New York

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Alan Vinegrad', is written over a horizontal line.

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